



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

April 23, 2024

**BY ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Alexander Gulkarov**  
S6 22 Cr. 20 (PGG)

Dear Judge Gardephe:

Pursuant to the Court's Order dated April 19, 2024 (D.E. 455), the Government submits this letter in response to the petition (the "Petition") filed by Regina Shakarova's ("Petitioner") asserting an interest in the real property located at 110-27 71<sup>st</sup> Avenue, Forest Hills, New York, Block 2233, Lot 54 (the "Subject Property") (D.E. 450).

**Background**

On or about November 3, 2023, the Court entered a Preliminary Order of Forfeiture (the "Preliminary Order") forfeiting to the Government all of the Defendant's right, title and interest in the Subject Property. The Preliminary Order was docketed on or about February 21, 2024.

Pursuant to Rule 32.2(b)(6) of the Federal Rule of Criminal Procedure which governs criminal forfeiture proceedings, the Government began publication on [www.forfeiture.gov](http://www.forfeiture.gov) providing notice of the Government's intention to seek forfeiture of the Subject Properties on March 15, 2024 and publication ended on April 13, 2024. Further, the Government provided direct notice to all third parties with a potential interest in the Subject Properties, by, *inter alia*, mailing a copy of the Preliminary Order to Petitioner and Vyacheslav Gulkarov on or about March 28, 2024.

On or about April 18, 2024, the Petitioner filed her Petition and asserted an interest in the Subject Property.

The claim period does not conclude until May 14, 2024 and, while unlikely, potential third parties that have not received direct notice can file claims to the Subject Property until that time. As such, the Government requests that no further action in this matter take place until that time period expires. Once the publication period has expired and if no further claims have been

filed against the Subject Property, the Government intends to request a period of 60 days to confer with counsel for Petitioner and any other third-party claimant about a potential resolution of the Petition. In the event those discussions do not result in a resolution, the Government may request a discovery schedule to resolve any factual disputes pursuant to Rule 32.2(c)(1)(B), which provides that the court may permit the parties to conduct discovery in the ancillary proceeding in accordance with the Federal Rules of Civil Procedure “if the court determines that discovery is necessary or desirable to resolve factual issues.” *Id.*

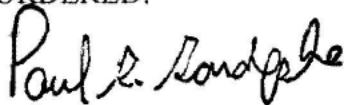
Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
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Ryan W. Allison  
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**MEMO ENDORSED:** The application is granted. If the matter is not resolved at the conclusion of the 60-day period, the parties will file a joint status letter with the Court.

SO ORDERED.



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Paul G. Gardephe  
United States District Judge

Date: April 23, 2024